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7 *Attorneys for Plaintiffs Debra Kooser and*
8 *Margaret Frankiewicz in Kooser et al. v.*
9 *Facebook Inc. et al, 18-cv-2009-YGR*

10
11 **UNITED STATES DISTRICT COURT**
12 **NORTHERN DISTRICT OF CALIFORNIA**

13 LAUREN PRICE, on behalf of herself and all
14 others similarly situated,

CASE NO. 3:18-CV-01732-VC

15 Plaintiff,

16 v.
17 FACEBOOK, INC, and CAMBRIDGE
ANALYTICA, LLC

PLAINTIFF DEBRA KOOSER AND
MARGARET FRANKIEWICZ'S
RESPONSE IN SUPPORT OF ORDER
OF REFERRAL TO DETERMINE
WHETHER CASES ARE RELATED

18 Defendants.

19 **TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:**

20 Pursuant to Civil Local Rule 3-12(e) and 7-11(b), Plaintiffs Debra Kooser and
21 Margaret Frankiewicz in *Kooser, et al v. Facebook, Inc., et al.*, Case No. 4:18-cv-2009-YGR
22 (N.D. Cal., filed April 2, 2018) ("Kooser Action"), hereby files their Response in Support of
23 Judge Rogers' Order of Referral to Determine Whether Cases Are Related. (Dkt. 30).

24 Plaintiffs Kooser and Frankiewicz agree that their action should be related to the six
25 cases in this District, *Price v. Facebook, Inc., et al.*, Case No. 3:18-cv-01732 (filed March 20,
26 2018) ("Price Action"), *Rubin v. Facebook, Inc., et al*, Case No. 18-cv-01852 (filed March
27 2018) ("Price Action"), *Rubin v. Facebook, Inc., et al*, Case No. 18-cv-01852 (filed March
28 2018) ("Price Action").

1 26, 2018) (“Rubin Action”), *Gennock et al. v. Facebook, Inc., et al.*, Case No. 4:18-cv-01891
 2 (filed March 27, 2018) (“Gennock Action”), *O’Kelly v. Facebook, Inc., et al.*, Case No. 3:18-
 3 cv-01915 (filed March 28, 2018) (“O’Kelly Action”), *Beiner, et al. v. Facebook, Inc., et al.*,
 4 No. 3:18-cv-1953 (filed March 29, 2018) (“Beiner Action”); and *Haslinger v. Facebook,*
 5 *Inc., et al.*, Case No. 4:18-cv-01984-YGR (filed March 30, 2018) (“Haslinger Action”)
 6 (collectively “The Actions”).

7 The Actions all concern substantially the same parties, property, transaction or event,
 8 in that they all concern the massive unauthorized harvesting of Facebook user’s personal
 9 information by Cambridge Analytica LLC (“Cambridge”) and used for Facebook and
 10 Cambridge’s financial benefit. *See Local Rule 3-12(a)(1).*

12 If the Kooser Action is not related, there will certainly be duplication of labor and
 13 expense and a risk of conflicting results, as The Actions will all seek discovery into the
 14 same underlying conduct of Defendants Facebook and Cambridge and relief in each action
 15 will be based on that conduct. *See Civ. L.R. 3-12(a)(2).*

17 Accordingly, the Court should relate The Kooser Action with The Actions and
 18 assign The Kooser Action to this Court’s calendar under Civil Local Rule 3-12(f).

19 Dated: April 13, 2018

20 /s/ Joshua H. Watson
 21 Joshua H. Watson

22 *Attorney for Plaintiffs and the Class*